
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

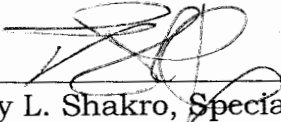
UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Cathy L. Waldor
 :
 JASON CASTELLANO and : Mag. No. 19-7492
 EDUARDO MORALES :
 :

I, Tiffany L. Shakro, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Drug Enforcement Administration and that this complaint is based on the following facts:

SEE ATTACHMENT B



Tiffany L. Shakro, Special Agent
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,
October 31, 2019, Essex County, New Jersey

Honorable Cathy L. Waldor
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Cocaine)

On or about October 30, 2019, in the District of New Jersey and elsewhere, the defendants,

**JASON CASTELLANO and
EDUARDO MORALES,**

knowingly and intentionally possessed with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT TWO

(Conspiracy to Distribute and Possess with Intent to
Distribute Cocaine)

On or about October 30, 2019, in the District of New Jersey and elsewhere,
the defendants,

**JASON CASTELLANO and
EDUARDO MORALES,**

did knowingly and intentionally conspire and agree with each other and with
others to distribute and possess with intent to distribute 500 grams or more of
a mixture and substance containing a detectable amount of cocaine, a Schedule
II controlled substance, contrary to Title 21, United States Code, Sections
841(a)(1) and (b)(1)(B).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Tiffany Shakro, am a Special Agent with the Drug Enforcement Administration. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, my review of reports, statements of individuals, documents, lawfully recorded communications, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. As a result of an active investigation into Jason Castellano ("CASTELLANO") and Eduardo Morales ("MORALES"), law enforcement obtained a search warrant for a residence located on Madison Avenue in Elizabeth, New Jersey.

2. On or about October 30, 2019, in anticipation of the execution of that warrant, law enforcement conducted surveillance in the area of the Madison Avenue Residence.

3. During that surveillance, law enforcement observed MORALES arrive in the area, exit his vehicle, and approach CASTELLANO who was standing in the immediate vicinity of the Madison Avenue Residence. After law enforcement observed MORALES hand a plastic bag to CASTELLANO, law enforcement intervened to execute the search warrant. At that time, law enforcement discovered that the plastic bag contained approximately 1 kilogram of cocaine.